

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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2004 SEP 23 P 3:25

Terri Pechner-James)
Sonia Fernandez)
Plaintiffs,)
)
v.)
)
City of Revere, Thomas Ambrosino, Mayor)
City of Revere, Police Department,)
Terrence Reardon, Chief,)
Bernard Foster, Salvatore Santoro, Roy)
Colannino, Frederick Roland, Thomas Doherty,)
John Nelson, James Russo, Michael Murphy,)
and Steven Ford,)
Defendants.)

U.S. DISTRICT COURT
DISTRICT OF MASS

C.A. NO. 03-12499-MLW

REVISED JOINT STATEMENT

Pursuant to Local Rule 16.1 (D) and this Court's Notice of Scheduling Conference, the parties hereby report to the Court as follows:

1) AGENDA FOR SCHEDULING CONFERENCE

The parties suggest the following agenda of matters to be discussed at the conference:

a) The proposed scheduling plan for discovery and motions;

2) DISCOVERY PLAN AND PROPOSED SCHEDULE FOR FILING MOTIONS

- a) All automatic discovery will be exchanged by November 29, 2004;
- b) Discovery will end on May 28, 2005;
- c) Plaintiffs will convey to defendants a report as required by Fed. R. Civ. P 26(a)(2) regarding any expert whose testimony will be offered at trial, no later than June 28, 2005;
- d) Defendants will convey to plaintiffs their Rule 26(a)(2) report no later than July 28, 2005;
- e) All expert depositions will be completed August 28, 2005;
- f) Dispositive motions pursuant to Rule 56 will be filed by September 28, 2005 with responses due 21 days after filing of dispositive motion.

g) Pretrial Conference:

The parties request a pretrial conference after a decision on the dispositive motions. The parties suggest December 28, 2005 with the trial scheduled in the weeks following.

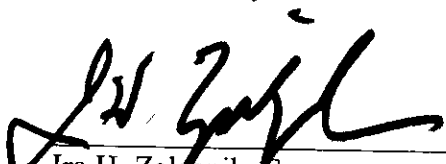
3) CERTIFICATIONS

The undersigned counsel shall file the required by Local Rule 16.1 Certifications separately with the Court regarding establishing a budget for the costs of conducting the full course, and various alternative courses, of litigation and to consider the resolution of the litigation through the use of alternative dispute resolution programs such as those outlined in Local Rule 16.4.

4) TRIAL BY MAGISTRATE

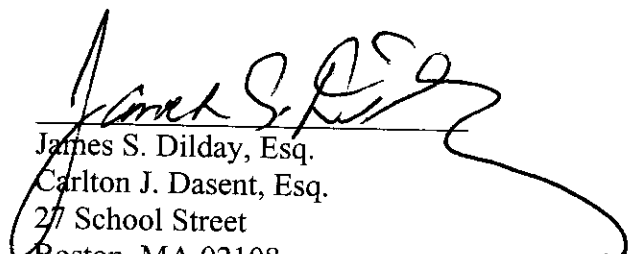
At this time the parties do not agree to trial by magistrate.

The Defendant,
City of Revere, Thomas Ambrosino,
Chief Terrence Reardon,
by their attorney,



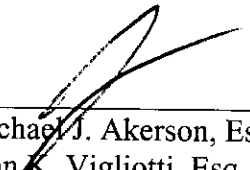
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The Plaintiffs, Sonia Fernandez and
Terri Pechner-James
by their attorneys,



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The Defendants,
Bernard Foster, Salvatore Santoro, Roy
Colannino, Frederick Roland, Thomas Doherty,
John Nelson, James Russo, Michael Murphy,
and Steven Ford
by their attorneys,



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